

73
July 12, 1983

steve
19
EPA-ARWM/PMTS

JUL 14 1983

Region VII K.C., MO

Mr. Steve Busch
EPA Region VII
324 East 11th Street
Kansas City, Missouri 64106

RE: MDAC Permit Application

Dear Mr. Busch:

This letter is to reply to your draft comments on the McDonnell Douglas Aircraft Permit Application. I have attached your draft comments on which I have identified some typographical errors. In addition I have the following comments.

G.F.S. Comment 3.

Please see comment 1 of the state's comment letter of March 4, 1983 and the applicant's response of April 13, 1983. It was the state's interpretation that off-site emergency response was unnecessary.

T.S. Comment 1.

See attached letter of July 7, 1983 to MDAC from Dave Bedan.

C.S. Comment 2.

Observations from the site visit indicated the floors are pitched to drain toward sump, but I agree that this should be spelled out in the application.

If you have any questions please contact me at this office.

Sincerely,

Joe Jansen

Joe Jansen
Environmental Engineer
Technical Services Section
Waste Management Program

JJ:gh

Enclosure

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368
1915 Southridge Drive
Jefferson City, Missouri 65102
(314) 751-3241



R00144191
RCRA RECORDS CENTER

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

Mr. J. C. Patterson
Section Manager
Environmental Pollution Control
McDonnell Douglas Corporation
Department 191C, Building 102, L-3
Box 516
St. Louis, Missouri 63166

DRAFT
JUL 05 1983

Dear Mr. Patterson:

WASTE
MANAGEMENT PROGRAM

The U.S. Environmental Protection Agency (EPA) Region VII Office is in the process of conducting a technical evaluation of your Resource Conservation and Recovery Act (RCRA) permit application. In conjunction with this evaluation, a review of the application and the supplemental information submitted January 17, 1983, to determine the completeness of your submission has been made. We have determined that the McDonnell Douglas Corporation (MDC) Tract I RCRA permit application is complete. Additional information to clarify, modify, or supplement previously submitted material is needed, however. Please respond to the following questions and/or comments within thirty (30) days of receipt of this letter.

General Facility Standards

1. Waste Analysis Plan - Wastes should be analyzed in accordance with procedures incorporated by reference in 40 CFR 260.11. For example, "Test Methods for Evaluating Solid Waste - Physical/Chemical Methods" (SW-846) should be utilized as the reference method in place of "Methods for Chemical Analysis of Water and Wastes." Are all test methods listed on Table C-2 (e.g., organics analyses)?
2. General Inspection Requirements - The inspection schedule description provided in your permit application does not provide sufficient information for us to adequately evaluate inspection procedures. Supplemental information is necessary. Please review 40 CFR 264.15, 264.174, and 264.194 and provide all necessary information. Inspection frequency of areas of inspection should be provided (e.g., six (6) - 750 gallon storage tanks: tank externally-daily, tank overflow control-daily, area around tank for evidence of leakage-weekly, emergency apparatus-monthly, internal inspection of tank-annually). The previous example is very brief in nature; you may wish to develop inspection lists on a daily, weekly, monthly, and annual basis and specify items evaluated at each location during an inspection. You must identify types of problems which are looked for in an inspection.

ARWM/WMBR-PMTS:SBusch:lmh:x6531:6-29-83:Disk B25

PMTS
Busch

PMTS
Harrington

WMBR
Morby

DRAFT

3. Preparedness and Prevention Requirements - Is all required equipment tested and maintained as necessary to assure its proper operation in time of emergency? Please describe. Is there access to a communication or an alarm system at each location where hazardous waste is stored? Please describe. Have arrangements been made to familiarize hospitals with properties of wastes handled? Please describe. Have any arrangements been made with other state or local authorities to aid in emergency situations? Please describe or explain refusals to enter into such arrangements.

4. Personnel Training - Please describe how the training program is designed to teach facility personnel who handle hazardous waste the proper procedure to effectively respond to an emergency. Will these personnel operate emergency equipment?

Tank Standards

1. Describe means to prevent overfilling of polytanks. If overfilling occurs, how will spillage be detected? Will operators of the "Industrial Waste Water Pretreatment Plant" be notified?" Are tank levels checked prior to the addition of wastes? What will be the maximum inventory of waste stored in each of the polytank systems? When are the polytank systems emptied or what criteria is used? What is the ultimate disposition for these wastes (polytank systems)?

Container Standards

1. In your application on page F-4, concerning "Container Inspection," "height of container stacking" is mentioned. On page D-2 you state "full drums are never ~~stacked~~." Are drums stacked?
2. Are the floors of storage areas sloped or pitched to drain leakage or other liquid to the sump area in order to prevent containers contact with standing of accumulated liquids? If no, explain how container contact with accumulated liquid is prevented.
3. Is liquid that has accumulated in the sump removed in a timely manner?

In responding to the previous questions and/or comments, it would be beneficial to incorporate your response into the text of your application in the form of a revision to the application. It would also be beneficial if your January 17, 1983, response was adjusted and managed in a similar manner. Again, please respond to our questions and/or comments within thirty (30) days of the receipt of their letter.

this

DRAFT

3

We have established a target decision schedule for your facility, which is as follows:

<u>Action</u>	<u>Time Frame</u>
McDonnell Douglas Corp. (MDC) Tract I response to EPA	30 days
EPA to complete technical review after MDC-Tract I response (assuming all necessary information is available)	30 days
EPA assembles Administrative Record and draft permit	30 days
EPA draft and issue public notice	15 days
Complete public comment period	45 days
Hold public hearing (if necessary)	45 days
Final permit issued	30 days

Thus, depending on the necessity of a public hearing, the final issuance of a RCRA permit would be anticipated between early January 1984 or mid to late February 1984.

If you have any questions, please do not hesitate to contact me or the member of my staff most familiar with this subject, Stephen Busch, at (816) 374-6531.

Sincerely yours,

Lyndell L. Harrington
Chief, Permits Section

ROUTING AND TRANSMITTAL SLIP

Date 7/27

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1.

Steve

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

I mailed your comment
letter before I
located this reply
from MDNR

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Phone No.

LH

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

Mr. J. C. Patterson
Section Manager
Environmental Pollution Control
McDonnell Douglas Corporation
Department 191C, Building 102, L-3
Box 516
St. Louis, Missouri 63166

119
DRAFT

Dear Mr. Patterson:

The U.S. Environmental Protection Agency (EPA) Region VII Office is in the process of conducting a technical evaluation of your Resource Conservation and Recovery Act (RCRA) permit application. In conjunction with this evaluation, a review of the application and the supplemental information submitted January 17, 1983, to determine the completeness of your submission has been made. We have determined that the McDonnell Douglas Corporation (MDC) Tract I RCRA permit application is complete. Additional information to clarify, modify, or supplement previously submitted material is needed, however. Please respond to the following questions and/or comments within thirty (30) days of receipt of this letter.

General F

1. Waste
incorpora
Evaluatir
as the re
Wastes."

2. General
provided
for us to
is neces
all neces
be provi
tank ove
emergenc
previous
lists on
at each
which ar
ARWM/WMB

PMTS
Busch

ROUTING AND TRANSMITTAL SLIP			Date
TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.	Joe Tanson	Mo DNR	
2.			
3.			
4.			
5.			
Action	File	Note and Return	
Approval	For Clearance	Per Conversation	
As Requested	For Correction	Prepare Reply	
Circulate	For Your Information	See Me	
Comment	Investigate	Signature	
Coordination	Justify		

REMARKS

Any comments would be appreciated. Hope to finalize this by 7/15/83

procedures
for
utilized
iter and
ses)?
n
ion
mation
vide
should
daily,
ekly,
;
tion
valuated
lems